

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Paris Alexander,

Case: 4:22-mj-30384

Assigned To : Ivy, Curtis, Jr

Assign. Date : 9/12/2022

Description: IN RE SEALED MATTER (kcm)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 5, 2022 in the county of Genesee in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description***18 U.S.C. § 922(n)****18 U.S.C. § 922(o)****receiving a firearm while under indictment****unlawful possession of a machinegun**

This criminal complaint is based on these facts:

That on or about September 5, 2022, Paris Alexander, an individual currently under indictment, knowingly and intentionally received and possessed a firearm, that is, a Glock, model 19, 9mm pistol, that firearm having traveled in interstate commerce, in violation of 18 U.S.C. § 922(n) (receiving a firearm while under indictment) and 18 U.S.C. § 922(o) (unlawful possession of a machinegun).

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence and/or by
reliable electronic means.

Date: September 12, 2022

City and state: Flint, MI


Complainant's signature

Todd Monfette, Special Agent, ATF

Printed name and title



Judge's signature

Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Todd Monfette, being first duly sworn, hereby depose and state as follows:

INTRODUCTION & AGENT BACKGROUND

1. I make this affidavit from personal knowledge based on the following: my participation in this investigation, including witnessing interviews by myself and/or other law enforcement officers, communications with others who have personal knowledge of the events and circumstances described herein, and information gathered through my training and experience. The information outlined below is for the limited purpose of obtaining a criminal complaint and an arrest warrant. I have not set forth each and every fact I have learned in this investigation.

2. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, United States Department of Justice, assigned to the Detroit Field Division since July 2017. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with ATF, I have conducted and or participated in numerous criminal investigations involving the possession and use of firearms, drug trafficking violations, criminal street gangs and other violations of federal law.

PURPOSE OF AFFIDAVIT

3. The purpose of this affidavit is to establish probable cause that Paris Alexander (DOB XX/XX/1993) violated 18 U.S.C. § 922(n) (receiving a firearm while under indictment) and 18 U.S.C. § 922(o) (unlawful possession of a machinegun) on or about September 05, 2022, in the Eastern District of Michigan.

4. In September of 2022, I reviewed a Computerized Criminal History (CCH) of Alexander, which revealed Alexander was under indictment in the 7th circuit court of Michigan as of August 10, 2022.

PROBABLE CAUSE

5. On September 06, 2022, I reviewed documents regarding the September 05, 2022, arrest of Paris Alexander, during which police recovered a Glock 19 pistol with a machine gun conversion kit installed.

6. On September 05, 2022, Michigan State Police (MSP) Troopers were on patrol in the area of Lavender Avenue and Barth Street observing a large gathering in the street from their fully marked patrol vehicle. MSP Trooper Whipple observed Alexander wearing a white t-shirt and black pants walking eastbound on Barth Street towards Lavender Avenue. Trooper Whipple observed Alexander grab and hold his right pocket and based upon Alexander's body language indicated to Trooper Whipple, based upon his training and experience, that Alexander was concealing a firearm.

7. Trooper Whipple utilized his patrol vehicle's spotlight to illuminate Alexander as he walked toward the sidewalk on Lavender Avenue. Trooper Whipple then observed what he recognized to be the shape of a pistol protruding from Alexander's right sweatpants' pocket. Alexander attempted to walk behind a large tree prior to Trooper Whipple shutting off his spotlight. Trooper Whipple observed a tan colored object being removed from Alexander's pocket.

8. Trooper Whipple and his partner Trooper Onda then moved their patrol vehicle closer to Alexander and activated the emergency lights. As the troopers exited their patrol vehicle, Alexander was slow to walk from behind the tree to the front of the patrol vehicle. Once Alexander approached the patrol vehicle the previously observed outline of a firearm in his right pocket was no longer there and his pocket appeared to be empty.

9. Trooper Whipple searched the area near the large tree Alexander walked from and located a tan colored Glock, model 19, 9mm pistol, S/N: ABTT433 with an extended magazine laying on the protruding tree roots where Alexander was observed for an extended period of time. An auto sear switch was observed installed on the firearm. Alexander was placed under arrest by MSP.

- A Law Enforcement Information Network (LEIN) query revealed the firearm was reported stolen by Genesee Township Police Department on April 16, 2021.

10. On September 06, 2022, S/A Dan Bowling and I conducted a post-*Miranda* custodial interview of Alexander at the Genesee County jail. Alexander provided the following information:

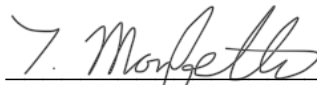
- Alexander stated on the night he was arrested he was wearing a tan shirt and black pants.
- Alexander acknowledged not being able to possess a firearm due to his current bond conditions.
- Alexander stated the firearm belonged to another individual.
- Alexander stated he knew what the firearm had “on it” which he identified as a “switch” (slang terminology for a machine gun conversion kit) which “made it fully automatic.”
- Alexander described the firearm as a tan colored Glock.
- Alexander stated he knew the firearm had a “switch” on it because the owner showed him during the party.
- Alexander stated his DNA was “probably” on the firearm because he “grabbed it and looked at it” during the party.

11. On September 06, 2022, I contacted Interstate Nexus Expert ATF Special Agent Dustin Hurt. SA Hurt advised, based upon the description provided, without physically examining the firearm, that the firearm is a firearm as defined under 18

U.S.C. § 921 and was manufactured outside of the state of Michigan after 1898, and therefore the firearm had traveled in and affected interstate commerce.

CONCLUSION

12. Based upon the above information, probable cause exists to believe that Paris Alexander, an individual currently under indictment, knowingly and intentionally received and possessed a firearm, that is, a Glock, model 19, 9mm pistol, that firearm having traveled in interstate commerce, in violation of 18 U.S.C. § 922(n) (receiving a firearm while under indictment) and 18 U.S.C. § 922(o) (unlawful possession of a machinegun). These violations occurred on or about September 05, 2022, in the Eastern District of Michigan.



Special Agent Todd Monfette
Bureau of Alcohol, Tobacco, Firearms and Explosives

Subscribed and sworn before me or by reliable electronic means on this 12th day of September 2022.



Hon. Curtis Ivy, Jr.
United States Magistrate Judge